IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DREAMWORKS ANIMATION LLC, 　　　　　Plaintiff, v. THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A", 　　　　　Defendants.	Case No. 25-cv-07205

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff DreamWorks Animation LLC ("Plaintiff") files this Motion requesting leave to file the following documents under seal: (1) Schedule A attached to the Complaint, which includes a list of the fully interactive, e-commerce stores operating under the seller aliases (the "Seller Aliases") and the e-commerce store URLs under the Online Marketplaces; and (2) Exhibit 3 to the Declaration of Monique Cheng Joe, which includes screenshot printouts showing the e-commerce stores operating under the Seller Aliases.

In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for trademark infringement, counterfeiting, false designation of origin, and copyright infringement. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant

relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Dated this 27th day of June 2025.   Respectfully submitted,

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